

GLENN AGRE BERGMAN & FUENTES LLP

Michael Paul Bowen
mbowen@glennagre.com
1185 Avenue of the Americas, 22nd Fl.
New York, New York 10036
o: (212) 358-5600
m: (914) 319-1827

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Via ECF

Hon. James L. Garrity, Jr.
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 601
New York, New York 10004

Re: In re Orly Genger, Case No. 19-13895; Adv. Proc. No. 22-01106-JLG

Your Honor:

The very rule cited by Dellaportas (Doc. 33) proves him wrong.

He cites Rule 26(d)(2)(A)(ii), which provides for “early Rule 34 Requests.” But he skipped over the next sentence, which states: “When Considered Served. The request is considered to have been served at the first Rule 26(f) conference.” FRCP 26(d)(2)(B). Since there has been no “first Rule 26(f) conference,” Sagi’s “demands” have not yet been served and are as yet ineffective and a legal nullity, requiring no response.

Respectfully submitted,

/s Michael Paul Bowen

cc: All Counsel (via ECF)